

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**AMENDED INFORMATIVE MOTION AND NOTICE OF REQUEST
TO BE HEARD AT THE DECEMBER 14-15, 2022 OMNIBUS HEARING**

The Ad Hoc Group of PREPA Bondholders (the “**Ad Hoc Group**”) submits this amended informative motion in response to the Court’s *Amended and Restated Order Regarding Procedures for Title VI Approval Hearing for the Puerto Rico Finance Corporation and December 14-15, 2022 Omnibus Hearing* (the “**Order**”) setting forth guidelines for parties wishing to be heard at the December 14-15, 2022 omnibus hearing (the “**Omnibus Hearing**”).

1. The Order requests that counsel who intend to speak at the Hearing file an informative motion identifying (a) the Party for which they intend to appear; (b) whether they intend to appear for the Qualified Modification Hearing, the Omnibus Hearing, or both; and (c)

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“**COFINA**”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“**HTA**”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“**ERS**”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“**PREPA**”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“**PBA**”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

the name(s), email address(es), and method of appearance for those attorney(s) who wish to participate in or observe the Hearings.

2. Amy Caton and Matthew M. Madden of Kramer Levin Naftalis & Frankel LLP will appear on behalf of the Ad Hoc Group at the Omnibus Hearing.

3. Ms. Caton and Mr. Madden do not intend to speak on behalf of the Ad Hoc Group but reserve the right to be heard on any matter raised by any party at the Omnibus Hearing related to the Title III cases, or any adversary proceeding pending in the Title III Cases, or the interests of the Ad Hoc Group.

[Remainder of Page Intentionally Left Blank]

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, today December 13, 2022.

TORO COLÓN MULLET P.S.C.
P.O. Box 195383
San Juan, PR 00919-5383
Tel.: (787) 751-8999
Fax: (787) 763-7760

/s/ Manuel Fernández-Bared
MANUEL FERNÁNDEZ-BARED
USDC-PR No. 204,204
E-mail: mfb@tcm.law

/s/ Linette Figueroa-Torres
LINETTE FIGUEROA-TORRES
USDC-PR No. 227,104
E-mail: lft@tcm.law

/s/ Nayda Perez-Roman
NAYDA PEREZ-ROMAN
USDC-PR No. 300,208
E-mail: nperez@tcm.law

Counsel for the Ad Hoc Group of PREPA Bondholders

KRAMER LEVIN NAFTALIS & FRANKEL LLP
1177 Avenue of the Americas
New York, New York 10036
Tel.: (212) 715-9100
Fax: (212) 715-8000

/s/ Alice J. Byowitz
AMY CATON*
THOMAS MOERS MAYER*
MATTHEW M. MADDEN*
ALICE J. BYOWITZ*
Email: acaton@kramerlevin.com
tmayer@kramerlevin.com
mmadden@kramerlevin.com
abyowitz@kramerlevin.com

*Admitted Pro Hac Vice

Counsel for the Ad Hoc Group of PREPA Bondholders

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party		
ATTORNEY 1	Appearance Method	Zoom, Omnibus Hearing
	Name	Amy Caton
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	acaton@kramerlevin.com
	Phone Number	(212) 715-7772
	Docket Entry No. of Notice of Appearance	73
	Zoom Username	PREPA Ad Hoc Group / Caton, Amy / Kramer Levin Naftalis & Frankel LLP
ATTORNEY 2	Appearance Method	Zoom, Omnibus Hearing
	Name	Matthew M. Madden
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	mmadden@kramerlevin.com
	Phone Number	(202) 775-4529
	Docket Entry No. of Notice of Appearance	73
	Zoom Username	PREPA Ad Hoc Group / Madden, Matthew / Kramer Levin Naftalis & Frankel LLP
Note: Pursuant to the Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party in interest shall be limited to 2 attorneys at any given time.		

EXHIBIT B
PARTY WITNESS COVER SHEET

Name of Party			Ad Hoc Group
Does the Party Intend to offer a witness?			No
Total Number of Witnesses			N/A
Witness Name	Expert of Fact Witness	Is Interpreter required? (Proponent of witness must provide certified interpreter)*	Scope of Testimony

* The Court does not provide interpreters for witness testimony.

EXHIBIT C
PARTY EXHIBIT COVER SHEET

Name of Party		Ad Hoc Group
Does the Party intend to offer evidence?		No
Docket Entry No. for Party Exhibit List		N/A
Exhibit Identifier	Docket Entry No. of Exhibit	Is there a pending request to seal this Exhibit?
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a).		